

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

ANNE SMITHERS and HENRY WILEY by his
mother and next friend ANNE SMITHERS

Plaintiffs,

- against -

FRONTIER AIRLINES INC.

Defendant.

Civil Action No. 1:18-cv-00676

Declaration of William T. Woodrow

William T. Woodrow, Esq., a partner of Stone and Woodrow LLP, attorneys for the Plaintiffs in this action declares the following to be true under penalties of perjury pursuant to 28 USC §1746.

1. A true and correct copy of an email transmission dated February 15, 2019 between Plaintiffs' and Defendant's counsel is attached hereto as Exhibit A.
2. A true and correct copy of Plaintiffs' First Notice of 30(b)(6) Deposition is attached hereto as Exhibit B.
3. A true and correct copy of an email transmission dated March 4, 2019 received from Defendant's counsel is attached hereto as Exhibit C.
4. A true and correct copy of Defendant's Objections to Plaintiffs' First Notice of 30(b)(6) Deposition is attached hereto as Exhibit D.
5. At the depositions of the Plaintiffs occurring on March 11, 2019, I spoke with Adam Nadelhoft, co-counsel for Frontier and told him that it was our view, based upon case law, that their objections were not sufficient to avoid producing a witness responsive to our notice, and that a protective order would be needed. I indicated at the same time that we would re-notice our deposition to address as many of their objections as we felt to be potentially meritorious.
6. A true and correct copy of an email transmission dated March 21, 2019 between Plaintiffs' and Defendant's counsel is attached hereto as Exhibit E.

7. A true and correct copy of Plaintiffs' Revised Notice of 30(b)(6) Deposition is attached hereto as Exhibit F.
8. A true and correct copy of an email transmission dated April 16, 2019 received from Defendant's counsel is attached hereto as Exhibit G.
9. A true and correct copy of Defendant's Objections to Plaintiffs' Revised Notice of 30(b)(6) Deposition served while Plaintiffs' attorney was in the air to conduct the deposition is attached hereto as Exhibit H.
10. A true and correct copy of relevant portions from pages 12-16 from the deposition transcript of Shawn Christensen dated April 17, 2019 in the instant action is attached hereto as Exhibit I.

I, William Woodrow, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.



William T. Woodrow, Esq.

Executed the 26th day of April, 2019 in Charlottesville, Virginia.